

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

CITY OF ANN ARBOR EMPLOYEES' : Civil Action No. 08-CV-01418
RETIREMENT SYSTEM, et al., Individually :
and On Behalf of All Others Similarly Situated, :
Plaintiffs, :
vs. :
CITIGROUP MORTGAGE LOAN TRUST :
INC., et al. :
Defendants. :
x

NOTICE OF LEAD PLAINTIFFS'
UNOPPOSED MOTION FOR: (1)
PRELIMINARY APPROVAL OF
SETTLEMENT, (2) CERTIFICATION OF
THE CLASS FOR PURPOSES OF
SETTLEMENT, (3) APPROVAL OF
NOTICE TO THE CLASS, AND (4)
SCHEDULING OF A FINAL APPROVAL
HEARING

PLEASE TAKE NOTICE that the City of Ann Arbor Employees' Retirement System and Greater Kansas City Laborers Pension Fund (collective, "Lead Plaintiffs"), through their counsel, hereby move this Court before the Honorable Leonard D. Wexler, United States District Judge, for an order pursuant to Rule 23 of the Federal Rules of Civil Procedure: preliminarily approving the proposed class action settlement; certifying the Settlement Class for settlement purposes only; approving the proposed forms of the Notice of Pendency of Class Action and Proposed Settlement and Final Approval Hearing and the Summary Notice of Pendency of Class Action and Proposed Settlement and Final Approval Hearing; approving the proposed methods of disseminating notice; approving Gilardi & Co. LLC as Claims Administrator; setting a date for the Final Approval Hearing; and such other and further relief as the Court deems just and proper. Defendants do not oppose this motion.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Lead Plaintiffs submit herewith Lead Plaintiffs' Memorandum of Law in Support of Unopposed Motion for: (1) Preliminary Approval of Settlement, (2) Certification of the Class for Purposes of Settlement, (3) Approval of Notice to the Class, and (4) Scheduling a Final Approval Hearing; the accompanying Declaration of Thomas E. Egler, dated August 24, 2012, with annexed exhibits; and the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice, with annexed exhibits.

DATED: August 27, 2012

Respectfully submitted,

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